



# **COMMONWEALTH of VIRGINIA**

## **DEPARTMENT OF ENVIRONMENTAL QUALITY**

### **TIDEWATER REGIONAL OFFICE**

Doug Domenech  
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### **STATEMENT OF LEGAL AND FACTUAL BASIS**

Portsmouth Genco LLC  
1 Wild Duck Lane  
Portsmouth, Virginia  
**Permit No. TRO-61049**

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Portsmouth Genco LLC has applied for a Title V Operating Permit for its Portsmouth, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Permit Writer:

\_\_\_\_\_  
Cindy L. Keltner  
(757) 518-2167

Date: **December 17, 2013**

Regional Air Permits  
Manager:

\_\_\_\_\_  
Troy D. Breathwaite

Date: **December 17, 2013**

Regional Director:

\_\_\_\_\_  
Maria R. Nold

Date: **December 17, 2013**

## **I. FACILITY INFORMATION**

### Permittee

Portsmouth Genco LLC  
1 Wild Duck Lane  
Portsmouth, Virginia 23703

### Facility

Portsmouth Genco LLC  
1 Wild Duck Lane  
Portsmouth, Virginia 23703

County-Plant Identification Number: 51-740-00081

### **A. SOURCE DESCRIPTION**

NAICS Code: 221122 – Fossil Fuel Electric Power Generation

Portsmouth Genco LLC is an electric power distribution plant which combusts bituminous coal in six (6) stoker-fired boilers, each rated at approximately 200 million Btu heat input per hour, to produce steam. The remainder of the steam is used to drive a turbine-generator to provide electricity that is sold to Virginia Power. The plant was originally permitted under the requirements of PSD in 1986. The boilers are traveling grate, overfeed, stoker boilers manufactured by Foster Wheeler and are normally operated at full load, 24 hours per day, 7 days per week. In addition to the stoker boilers, other emission sources on the plant site include the coal handling operations and the ash handling operations. Coal is delivered to the site via barge and off-loaded to a conveyor belt. The flat conveyor belt is formed into a tube to carry the coal to the coal storage yard. The coal is stacked onto a pile over underground hoppers. From these hoppers, coal is fed onto a conveyor belt for delivery into the plant where it is stored in a bunker for each boiler. The ash produced from the fuel combustion and that is collected by the boiler baghouse is collected and pneumatically conveyed to a storage silo. The ash is unloaded from the silos into trucks. The facility also maintains a 340 brake horsepower emergency diesel water pump for fire control purposes.

The facility is a Title V major source of PM-10, SO<sub>2</sub>, NO<sub>x</sub>, CO. This source is located in an attainment area for all pollutants and is a PSD major source. The facility is permitted under a PSD Permit issued on October 23, 2009.

## **II. COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

### III. EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit I (EU ID)	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Stack ID	Pollutant Controlled	Applicable Permit Date
<b>Fuel Burning Equipment</b>							
1A	Foster-Wheeler stoker boiler/1986	175,000 lbs steam/hour 200 mmBtu/hour heat input	Fabric filter baghouse: Wheelabrator-Frye MDL 168 Series 6P with a control efficiency of 99.1%	1A	001	PM	10/23/09 PSD
			Dry Flue Gas Desulfurization System with a control efficiency of 90%	1A-1	001	SO2	
1B	Foster-Wheeler stoker boiler/1986	175,000 lbs steam/hour 200 mmBtu/hour heat input	Fabric filter baghouse: Wheelabrator-Frye MDL 168 Series 6P with a control efficiency of 99.1%	1B	001	PM	10/23/09 PSD
			Dry Flue Gas Desulfurization System with a control efficiency of 90%	1B-1	001	SO2	
1C	Foster-Wheeler stoker boiler/1986	175,000 lbs steam/hour 200 mmBtu/hour heat input	Fabric filter baghouse: Wheelabrator-Frye MDL 168 Series 6P with a control efficiency of 99.1%	1C	001	PM	10/23/09 PSD
			Dry Flue Gas Desulfurization System with a control efficiency of 90%	1C-1	001	SO2	
2A	Foster-Wheeler stoker boiler/1986	175,000 lbs steam/hour 200 mmBtu/hour heat input	Fabric filter baghouse: Wheelabrator-Frye MDL 168 Series 6P with a control efficiency of 99.1%	2A	002	PM	10/23/09 PSD

Emission Unit I (EU ID)	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Stack ID	Pollutant Controlled	Applicable Permit Date
			Dry Flue Gas Desulfurization System with a control efficiency of 90%	2A-1	002	SO2	
2B	Foster-Wheeler stoker boiler/1986	175,000 lbs steam/hour 200 mmBtu/hour heat input	Fabric filter baghouse: Wheelabrator-Frye MDL 168 Series 6P with a control efficiency of 99.1%	2B	002	PM	10/23/09 PSD
			Dry Flue Gas Desulfurization System with a control efficiency of 90%	2B-1	002	SO2	
2C	Foster-Wheeler stoker boiler/1986	175,000 lbs steam/hour 200 mmBtu/hour heat input	Fabric filter baghouse: Wheelabrator-Frye MDL 168 Series 6P with a control efficiency of 99.1%	2C	002	PM	10/23/09 PSD
			Dry Flue Gas Desulfurization System with a control efficiency of 90%	2C-1	002	SO2	
FP	Emergency diesel power fire pumps	2.83 MMBtu/hr					10/23/06 NSR
<b>Coal Handling</b>							
FS3	Coal unloading and stock out: unloading hopper, covered conveyor, stock	600 tons coal/hour	Water spray/wet dust suppression	3	NA	PM	10/23/09 PSD
FS4	Coal screening/classifier / crusher system with associated conveyors	300 tons coal/hour	Water spray at transfer points	4A	NA	PM	10/23/06 NSR
			Bagfilter on classifier/screener	4B	F-4	PM	

Emission Unit I (EU ID)	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Stack ID	Pollutant Controlled	Applicable Permit Date
1-2A	Boiler 1A coal storage bunker	270 tons coal/hour	Fabric filter baghouse: Dalamatric DLMV1 5	1-2A	1-2A	PM	10/23/09 PSD
1-2B	Boiler 1B coal storage bunker	270 tons coal/hour	Fabric filter baghouse: Dalamatric DLMV1 5	1-2B	1-2B	PM	10/23/09 PSD
1-2C	Boiler 1C coal storage bunker	270 tons coal/hour	Fabric filter baghouse: Dalamatric DLMV1 5	1-2C	1-2C	PM	10/23/09 PSD
2-2A	Boiler 2A coal storage bunker	270 tons coal/hour	Fabric filter baghouse: Dalamatric DLMV1 5	2-2A	2-2A	PM	10/23/09 PSD
2-2B	Boiler 2B coal storage bunker	270 tons coal/hour	Fabric filter baghouse: Dalamatric DLMV1 5	2-2B	2-2B	PM	10/23/09 PSD
2-2C	Boiler 2C coal storage bunker	270 tons coal/hour	Fabric filter baghouse: Dalamatric DLMV1 5	2-2C	2-2C	PM	10/23/09 PSD
<b>Unit 1 Fly Ash System (total system rating of 4 tons of ash/hour)</b>							
1-3	Storage Silo		Bagfilter: A-S-H Binvent	1-3A	1-3A	PM	10/23/09 PSD
1-3	Vacuum system		Filter: In line cartridge filter Cyclone: A-S-H Co. T-42 primary collector Bag filter: A-S-H Co. T-42 w/Micropulsair Mdl 42-8-18 hg	1-3B 1-3E 1-3F	1-3B	PM	10/23/09 PSD

Emission Unit I (EU ID)	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Stack ID	Pollutant Controlled	Applicable Permit Date
1-3	Vacuum system		Filter: In line cartridge filter Cyclone: A-S-H Co. T-42 primary collector Bag filter: A-S-H Co. T-42 2/Micropulsair Mdl 42-8-18 hg	1-3C 1-3E 1-3F	1-3C	PM	10/23/09 PSD
1-3	Wet unloader		Pugmill: A-S-H-C-40 pugmill	1-3D	1-3D	PM	10/23/09 PSD
<b>Unit 2 Fly Ash System (total system rating of 4 tons of ash/hour)</b>							
2-3	Storage Silo		Bagfilter: A-S-H Binvent	2-3A	2-3A	PM	10/23/09 PSD
2-3	Vacuum system		Filter: In line cartridge filter Cyclone: A-S-H Co. T-42 primary collector Bag filter: A-S-H Co. T-42 w/Micropulsair Mdl 42-8-18" hg	2-3B	2-3B	PM	10/23/09 PSD
2-3	Vacuum system		Filter: In line cartridge filter Cyclone: A-S-H Co. T-42 primary collector Bag filter: AA-S-H Co. T-42 w/Micropulsair Mdl 42-8-18" hg	2-3C 2-3E 2-3F	2-3C	PM	10/23/09 PSD
2-3	Wet unloader		Pugmill: A-S-H C-40 pugmill	2-3D	2-3D	PM	10/23/09 PSD

Emission Unit I (EU ID)	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Stack ID	Pollutant Controlled	Applicable Permit Date
<b>Bottom Ash System</b>							
1-4	Bottom Ash Silo		Binvent filter	1-4	1-4	PM	10/23/06 NSR
	Unit 1 Vacuum System		Primary collector	1-4A	1-4A or B	PM	10/23/06 NSR
			Micropulsaire Mdl 42-8-18"Hg Bagfilter	1-4B	1-4A or B	PM	10/23/06 NSR
			In –line Cartridge Filter				
	Unit 2 Vacuum System		Primary collector	2-4A	2-4C or B	PM	10/23/06 NSR
			Micropulsaire Mdl 42-8-18"Hg Bagfilter	2-4B	2-4C or B	PM	10/23/06 NSR
			In-line Cartridge Filter	2-4C	2-4C or B	PM	10/23/06 NSR
	Wet Unloader		Pugmill	1-4D	1-4D	PM	
<b>Lime Storage System</b>							
1-5	Lime Silo		Vent Filter with Reverse-Air Purge	1-5	1-5	PM	10/23/06 NSR

#### IV. EMISSIONS INVENTORY

A copy of the 2012 annual emission update is attached. Emissions are summarized in the following tables.

2012 Actual Emissions

	2012 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	NO <sub>x</sub>
Facility Wide	0.2	64.5	155.1	1.9	84.8

2012 Facility Hazardous Air Pollutant Emissions

Pollutant	2012 Hazardous Air Pollutant Emission in Tons/Yr
H <sub>2</sub> SO <sub>4</sub>	0.5
HCL	0.7
HF	0.0
MC	0.0
NH <sub>3</sub>	0.0

#### V. REQUESTED CHANGE

The facility is requesting a synthetic limit on HAPs to keep out of 40 CFR Part 63, Subpart DDDDD. Since the facility will not be major for HAPs, they become an area source for HAPs and therefore subject to 40 CFR Part 63, Subpart JJJJJ.

#### VI. CHANGES TO THE TITLE V PERMIT

The new federal operating permit incorporates the newest boilerplate language. This includes separating the fuel burning equipment from the rest of the facility processes.

##### A. Limitations

Condition VI.A.1:

Hazardous air pollutant (HAP) emissions, as defined by §112(b) of the Clean Air Act, from the stationary source shall be less than 10 tons per year of any individual HAP or 25 tons per year of any combination, calculated monthly as the sum of each consecutive 12 month period using the following formulas. HAPs which are not accompanied by a specific CAS number shall be calculated as the sum of all compounds containing the named chemical when determining compliance with the individual HAP emissions limitation of 10 tons per year.  
 (9 VAC 5-80-490 B & C)



## **B. Monitoring**

A Compliance Assurance Monitoring (CAM) Plan for PM was included in the application for the facility according to 40 CFR 64.2. This was due to the fact that the six (6) boilers each have a fabric filter baghouse as a means to control PM and PM<sub>10</sub> emissions, are subject to an emission limitation, and have uncontrolled PM and PM<sub>10</sub> emissions that are above major source thresholds. To incorporate this into the Title V permit, the following statement was inserted after Section III. B, Monitoring.

"The following conditions, 3-4, 8, 12, and 13, are included in this Title V permit to implement the requirements of the CAM regulations (40 CFR 64)."

A Quality Improvement Plan (QIP) was also included for PM and PM<sub>10</sub> in the facility's application as part of the CAM Plan according to 40 CFR 64.8. Since the proposed plan was approved by the Department, the following Condition 14 was inserted in Section III.B:

"The permittee shall develop a Quality Improvement Plan (QIP) for the fabric filters if six excursions from the indicator specified in the Compliance Assurance Monitoring (CAM) Plan Fabric Filter for PM Control occur within a six month period, according to 40 CFR § 64.8."  
(9 VAC 5-80-110 and 40 CFR § 64.8)

Therefore, the CAM Plan for PM/PM-10 is now part of the Title V permit.

A CAM Plan was not needed from the facility for NO<sub>x</sub> since the facility is exempt by 40 CFR 64.2 (b)(1)(vi) which states, "The requirements of this part shall not apply to any of the following emission limitations or standards...Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in §64.1." The previous Title V permit already required the facility to have NO<sub>x</sub> CEMs to monitor NO<sub>x</sub> emissions from NSPS. In addition, per § 64.2(b)(iii), the requirements for a CAM Plan was not needed from the facility for SO<sub>2</sub> emissions since they are applicable to the Acid Rain Program requirements pursuant to sections 404, 405, 406, 407(a), 407(b), or 410 of the Act.

### **Condition VI.B.1**

The permittee shall sample and analyze fuel from at least one shipment of coal annually to determine the chloride concentration in the coal sample at a 90% confidence level. The chloride concentration data shall be used to update the applicable HCL and HF emission factor for coal-fired boilers, and to determine the hydrogen chloride and hydrogen fluoride emissions from the boilers.

## **C. Recordkeeping**

### **Condition VI.C.1.b**

Monthly emissions calculations for HAPs from the boiler stack (Stack ID 001 and 002) using calculation methods approved by the Tidewater Regional Office to verify compliance with the emissions limitations in Condition III.A.8.

## **Section IV**

Addition of 40 CFR, Part 63, Subpart JJJJJ requirements for the 6 boilers is included in the Title V permit. Since the facility has opted for a synthetic minor for HAPs, they become an area source facility and are therefore subject to MACT JJJJJ requirements.

#### **D. GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions:

##### **Condition B. Permit Expiration**

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

This general condition cite(s) the Article(s) that follow(s):

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-80. Application

9 VAC 5-80-140. Permit Shield

9 VAC 5-80-150. Action on Permit Applications

##### **b. Condition F. Failure/Malfunction Reporting**

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:

9 VAC 5-40-41. Emissions Monitoring Procedures for Existing Sources

9 VAC 5-40-50. Notification, Records and Reporting

9 VAC 5-50-50. Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:  
40 CFR 60.13 (h). Monitoring Requirements.

##### **c. Condition J. Permit Modification**

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9 VAC 5-80-190. Changes to Permits

9 VAC 5-80-260. Enforcement

9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

d. Condition U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction

9 VAC 5-80-110. Permit Content

e. Condition Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70. Designated Emissions Standards

9 VAC 5-80-110. Permit Content

## **VII. STATE ONLY APPLICABLE REQUIREMENTS**

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5-50-310, Odorous Emissions

9 VAC 5-50-320, Toxic Pollutants

## **VIII. FUTURE APPLICABLE REQUIREMENTS**

Portsmouth Genco LLC will be subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, MACT (Subpart JJJJJ) as of the compliance date of March 21, 2014.

## **IX. INAPPLICABLE REQUIREMENTS**

New Source Performance Standard (NSPS) Requirements for Industrial-Commercial-Institutional Steam Generating Units in 40 CFR Part 60, Subpart Db are not currently applicable for SO<sub>2</sub>. The NSPS requirements do not include limitations or requirements for SO<sub>2</sub> for coal fired boilers per 40 CFR § 60.40b(b)(1).

New Source Performance Standard (NSPS) Requirements for Stationary Compression Ignition Internal Combustion Engines 40 CFR Part 60, Subpart IIII is not applicable to existing units.

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 4 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

## **X. COMPLIANCE PLAN**

A Compliance Assurance Monitoring (CAM) Plan for PM was included in the application for the facility according to 40 CFR 64.2. This was due to the fact that the six (6) boilers each have a fabric filter baghouse as a means to control PM and PM<sub>10</sub> emissions, are subject to an emission limitation, and have uncontrolled PM and PM<sub>10</sub> emissions that are above major source thresholds. To incorporate this into the Title V permit, the following statement was inserted right after Section III. B, Monitoring.

"The following conditions, 3-4, 8, 12, and 13, are included in this Title V permit to implement the requirements of the CAM regulations (40 CFR 64)."

A Quality Improvement Plan (QIP) was also included for PM and PM<sub>10</sub> in the facility's application as part of the CAM Plan according to 40 CFR 64.8. Since the proposed plan was approved by the Department, the following Condition 14 was inserted in Section III.B:

"The permittee shall develop a Quality Improvement Plan (QIP) for the fabric filters if six excursions from the indicator specified in the Compliance Assurance Monitoring (CAM) Plan Fabric Filter for PM Control occur within a six month period, according to 40 CFR § 64.8."  
(9 VAC 5-80-110 and 40 CFR § 64.8)

Therefore, the CAM Plan for PM/PM-10 is now part of the Title V permit.

A CAM Plan was not needed from the facility for NO<sub>x</sub> since the facility is exempt by 40 CFR 64.2 (b)(1)(vi) which states, "The requirements of this part shall not apply to any of the following emission limitations or standards...Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in §64.1." The previous Title V permit already required the facility to have NO<sub>x</sub> CEMs to monitor NO<sub>x</sub> emissions from NSPS. In addition, a CAM Plan was not needed from the facility for SO<sub>2</sub> emissions since SO<sub>2</sub> is part of the Acid Rain program requirements.

## **XI. INSIGNIFICANT EMISSION UNITS**

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation <sup>1</sup> (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
1-4	Turbine lube oil tank vent	Emissions level 9 VAC 5-80-720 B	VOC	n/a
2-4	Turbine lube oil tank vent	Emissions level 9 VAC 5-80-720 B	VOC	n/a
1-5	Cooling tower	9 VAC 5-80-720 A	PM	n/a
2-5	Cooling tower	9 VAC 5-80-720 A	PM	n/a
6	Diesel fuel storage tank	Emissions level 9 VAC 5-80-720 B	VOC	n/a
SK	Parts cleaner	Named activity 9 VAC 5-80-720 A 24		35 gals <0.07 tpy
7	Oil/Water separator	Named activity 9 VAC 5-80-720 A 41		Emergency use only < 5.0 tpy

<sup>1</sup>The citation criteria for insignificant activities are as follows:

- 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
- 9 VAC 5-80-720 B - Insignificant due to emission levels
- 9 VAC 5-80-720 C - Insignificant due to size or production rate

## **XII. CONFIDENTIAL INFORMATION**

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

## **XIII. PUBLIC PARTICIPATION**

The proposed permit will be placed on public notice in the Virginian-Pilot newspaper from Thursday, October 31, 2013 to Monday, December 2, 2013.